

December 30, 2015

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By ECF

The Honorable Paul A. Engelmayer United States District Judge Southern District of New York United States Courthouse 40 Foley Square New York, New York 10007-1312

Re: Inter-American Development Bank v. Venti, S.A., 1:15-cv-04063-PAE

Dear Judge Engelmayer:

We represent Plaintiff Inter-American Development Bank (the "IDB"). We write pursuant to this Court's Order dated December 29, 2015 (the "Order") (Dkt. 58).

We confirm that the IDB has served Venti S.A. and Industrias Metalúrgicas Pescarmona S.A.I.C. y F. (collectively "Defendants") with the Order and with IDB's Motion to Enforce Judgment, Appoint a Receiver and Issue a Permanent injunction. We transmitted a copy of the Notice of Motion, the Memorandum of Law in Support of the Motion and the Order to Defendants' General Counsel, Hernan Iglesias, via email on December 29, 2015. Due to the size of the Declaration filed in support of the Motion, we separately provided Mr. Iglesias with an FTP web site containing that Declaration and all other filed motion papers. *See* Exhibit A.

Additionally, although we were unable to locate a next day delivery service to Argentina, we did make arrangements to have copies of the motion papers and the Order hand-delivered to Mr. Iglesias at his offices. We have confirmed that those papers were delivered today, December 30, 2015. *See* Exhibit B.¹

Finally, pursuant to N.Y. C.P.L.R. 5225(a), we have served a copy of the motion papers on Defendants' registered agent for service of process here in New York. Affidavits of service are attached at Exhibit C.

Respectfully submitted,

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David Daniels

¹ We had sent the motion papers to Defendants via Federal Express on the date they were first filed. However, Federal Express has advised us that that separate copy set has not yet been delivered.

Portrait Building, 701 8th Street, NW Washington, DC 20001-3727

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(via e-mail and U.S. mail) cc: Hernán H. Iglesias, Esq., General Counsel for IMPSA and Venti